EPA REG. No 81433-2 Vol. 1



The Acta Group, L.L.C.

1203 Nineteenth Street, N.W. ● Suite 300 ● Washington, D.C. 20036

Tel: 202/266-5020 ● Fax: 202/557-3836

www.actagroup.com

June 13, 2005

Via Certified Mail 7002 1000 0004 6668 3285 Return Receipt Requested

Mr. K. Bo Davis U.S. Environmental Protection Agency Office of Pesticide Programs (MC 7505C) 1200 Pennsylvania Avenue, N.W. Washington, DC 20460

Re: Revised Final Printed Labels for IMS Trading, LLC Products,

Registration Nos. 81433-2, 81433-3, 81433-4, and 81433-5

Dear Mr. Davis:

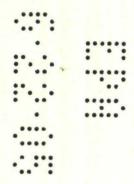
As required by the registration acceptance letters dated February 25, 2005, from the U.S. Environmental Protection Agency (EPA), IMS Trading, LLC (IMS) is submitting the enclosed revised final printed labels for the above-referenced registered products. If you have any questions or comments about the enclosed labels, please call me at (202) 266-5031.

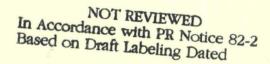
Sincerely,

Sheryl Lindros Dolan

Attachments

cc: Mr. Isaac M. Shapiro (w/o attachments) (via e-mail)





FEB 24 2005









KILLS MOTHS & CARPET BEETLES

NO CLINGING ODOR PROTECTS CLOTHING

WHEN USED IN AIR-TIGHT CONTAINERS THIS PRODUCT CAN TREAT UP TO 57 cu. ft.

KEEP OUT OF REACH OF CHILDREN.

WARNING: SEE SIDE AND
BACK PANEL FOR
ADDT'L PRECAUTIONS

INGREDIENT STATEMENT
ACTIVE INGREDIENT PARADICHLOROBENZENE 99. 8%
INERT INGREDIENTS 0.2%
TOTAL: 100%

NET WT. 10 OZ. (283.5g)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with labeling.

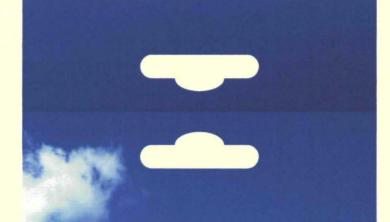
Thoroughly brush or clean articles to be stored. Use at rate of 1 bag (10 oz.) for each 57 cubic ft. of tightly enclosed space. Distribute IMS Moth Balls evenly around and between the folds of stored articles. Be sure storage space is kept tightly closed at all times and for at least 7 days after protecting with IMS Moth Balls.

IMS Moth Balls will not harm the finest woolens furs, silk, or other fabrics Pleasant odor quickly vanishes when articles are aired

Paradichlorobenzene Moth Balls should not be mixed or placed in contact with Naphthalene Moth Balls or Flakes.

Do not use in plastic storage box or place in contact with plastic items as paradichlorobenzene damages some plastics









PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS **WARNING:**

Causes eye, skin, and respiratory tract irritation. Harmful if swallowed. Avoid contact with skin, eyes, or clothing.

Physical-Chemical Hazard. Combustible. Do not use or store near heat or open flame.

FIRST AID

If Swallowed Call a poison control center or doctor immediately for treatment advice

Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.

Call a poison control center or doctor for treatment advice.

Move person to fresh air.

If on Skin or

Clothing

If In Eyes

whose person to tream air if person is, not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible Call a poison control center or doctor for further treatment advice. Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.

NOTE TO PHYSICIAN

Probable mucosal damage may contraind

STORAGE AND DISPOSAL

Do not reuse empty box or cellophane. Wrap container and put in trash.

NOTICE:

If Inhaled

California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

EPA Reg. No. 81433-2 EPA Est. 81217-CHN-001

DISTRIBUTED BY: IMS TRADING, LLC.



35 A 3-3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

August 6, 2004

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

OPP Decision Number: D-345117

EPA File Symbol or Registration Number: 81433-E

Product Name: IMS MOTH BALLS EPA Receipt Date: 28-May-2004 EPA Company Number: 81433

Company Name: IMS TRADING, LLC

ISAAC SHAPIRO IMS TRADING, LLC 4225 LONGRIDGE AVE., #207 STUDIO CITY, CA 91604-

SUBJECT: Approval of 100% Small Business Waiver Request

Dear Registrant:

The Office of Pesticide Programs has approved your request for 100% waiver of the pesticide registration fee associated with the action referenced above. The decision review period for this action begins on the date of this letter.

The Action has been identified as Action Code: R31.1

NEW PRODUCT; NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT CHEMISTRY; ACUTE TOXICITY; PUBLIC HEALTH PEST EFFICACY); Reduced Fee: Linked to PRIA Application;

If you have any questions, please contact Pesticide Registration Service Fee Ombudsman, Linda Arrington at (703) 305-6249.

* athle

Sincerely,

Arnold E. Layne, Director

Information Resources and Services Division



U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Registration Division (7505C) 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460

Date of Issuance:

81433 - 2FEB 2 4 2005

NOTICE OF PESTICIDE:

_X Registration

Reregistration

(under FIFRA, as amended)

Term of Issuance: Conditional

EPA Reg.

Number:

Name of Pesticide Product:

IMS Moth Balls

Name and Address of Registrant (include ZIP Code):

IMS Trading, LLC

4225 Longridge Ave #207

Studio City, CA 91604

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

- Submit and/or cite all data required for registration/reregistration of your product when the Agency requires all registrants of similar products to submit such data.
- 2. Make the following label changes before you release the product for shipment:
 - a. Revise the EPA Registration Number to read, "EPA Reg. No.
 - Include the following information under the "Ingredient Statement":

Active Ingredient.....99.8% Other Ingredient.....0.2% Total.....100%

c. Include the following statement:

"Physical-Chemical Hazard. Combustible. Do not use or store near heat or open flame."

It is recommended that the following "First Aid" label changes be made as described in PR Notice 2001-1.

Signature of Approving Official:

Daniel C. Kenny, Product Manager (01)

Insecticide-Rodenticide Branch, Registration Division (7505C)

FFR 2 4 2005

Revise the "Statement of Practical Treatment" title to read, "First Aid".

Revise the "First Aid" statements to read:

If Swallowed:

- -Call a poison control center or doctor immediately for treatment advice.
- -Have person sip a glass of water if able to swallow.
- -Do not induce vomiting unless told to do so by a poison control center or doctor.
- -Do not give anything by mouth to an unconscious person.

If On Skin Or Clothing:

- -Take off contaminated clothing.
- -Rinse skin immediately with plenty of water for 15-20 minutes.
- -Call a poison control center or doctor for treatment advice.

If Inhaled:

- -Move person to fresh air.
- -If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
 -Call a poison control or doctor for further treatment advice.

If In Eyes:

-Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

-Call a poison control center or doctor for treatment advice.

Beneath the "Fist Aid" statements, include the following information:

"Have the product container or label with you when calling a poison control center of doctor, or going for treatment. You may also contact 1-800-xxx-xxxx (insert number) for emergency medical treatment information."

Note To Physician

Probable mucosal damage may contraindicate the use of gastric lavage.

3. Submit one copy of the revised final printed label for the record before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

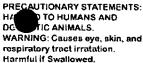
Daniel C. Kenny Product Manager (01) Insecticide-Rodenticide Branch Registration Division (7505C)

Enclosure

ACCEPTED with COMMENTS In EPA Letter Dated:

FEB 2 4 2005 Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No.





Harmful If Swallowed. Avoid contact with skin, eyes, or clothing. STATEMENT OF PRACTICAL TREATMENT:

IF SWALLOWED: Drink promptly a large quantity of water. Do not induce vemiting. Avoid alcohol. Got medical attention.

ES: Immediately flush w/ of water for at least 15 tes, Get medical attention. IF ON SKIN: immediately flush w/ plenty of water. Remove contaminated clothing. Wash clothing before reuse. IF INHALED: Remove to fresh air. eathing, give artificial ion. If breathing is difficult, give oxygen. Get medical attention. STORAGE AND DISPOSAL: cuse empty box or ne. Wrap container and put in trash.

NOTICE: California has determined that a chemical contained in this product casues cancer based on tests performed on laboratory animals.

EPA Rog. No. EPA Est.









KEEP OUT OF REACH OF CHILDREN. WARNING: SEE SIDE PANEL FOR ADDT'L INSTRUCTIONS.



ADDITIONAL PRECAUTIONS

ACTIVE INGREDIENT: PARADICHLOROBENZENE INERT INGREDIENTS:

TOTAL:

NET WT. 7 OZ. (198.45g)



DIRECTION FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Thoroughly brush or clean articles to be stored. Use at rate of 1 bag (7 oz.) for each 40 cubic ft. of tightly enclosed space. Distribute IMS Moth Balls evenly around and between the folds of stored articles. Be sure storage space is kept tightly closed at all times and for at least 7 days after protecting with IMS Moth Balls.

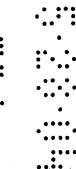
IMS Moth Balls will not harm the finest woolens, furs, silk, or other fabrics. Pleasant odor quickly vanishes when articles are aired.

Paradichlorobenzene Moth Balls should not be mixed or placed in contact with Naphthalono Moth Balls or Flakes.

Do not use in plastic storage box or place in contact with plastic items as paradichlorobenzene damages some plastics.

DISTRIBUTED BY:







DATE OUT: 07/ FEB / 2005

PRODUCT CHEMISTRY REVIEW OF MP [] EP [X] SUBJECT:

DP BARCODE No.: D304941File Symbol No.: 81433-E

PRODUCT NAME: IMS Moth Balls COMPANY: IMS Trading, LLC

FOOD USE [] INTEGRATED FORMULATION []

PCC: 061501; Decision No. 345117

FROM:

TO:

Technical Review Branch/RD (7505C)

Jim Tompkins / Vickie Walters, PM 25
Herbicide Branch / RD(7505C)

INTRODUCTION:

The registrant has submitted product chemistry data in support of the registration application for the proposed end use product "IMS Moth Balls". The product chemistry data have been submitted under MRID No. 462853-02. The registrant has submitted CSF for basic formulation (dated 05/10/04). The registrant has claimed that the proposed product is substantially similar to a registered product with Reg. No. 1475-39. The TRB has been asked to evaluate product chemistry data submitted and determine its smilarity to the registered product.

SUMMARY OF FINDINGS

- 1. The proposed product contains IMS p-Dichlorobenzene technical (Reg. No. 81433-R, 99.8%) as the active ingredient with product label claim of 99.8%.
- 2. The CSF for the basic formulation (dated 05-10-04) is filled out correctly and completely. The nominal concentration of the active ingredient concurs with the product label claim nominal concentration. The CSF is in compliance with PR Notice 91-2. All the inert ingredients used in the formulation are cleared by the Agency. The data submitted corresponding to the guideline reference 830.1550 (Product Identity & composition) and 830.1750 (Certified limits) satisfy the data requirements of 40CFR§158.155 and 158.175 respectively.
- 3. The data submitted corresponding to the guideline reference 830.1600 (description of materials used to produce the product), 830.1650 (description of formulation process), and 830.1670 (discussion on the formation of impurities) satisfy the data requirement 40§CFR158.160, 158.165 and 158.167 respectively [MRID No. 462853-02].
- 4. The data submitted corresponding to the guideline reference 830.1800 (Enforcement analytical method) satisfy the data requirements of 40CFR§158.180. The GC/FID method was used to assay the active ingredient in the product [MRID No. 462853-01].

DP BARCODE No.: D304941 File Symbol No.: 81433-E PRODUCT NAME: IMS Moth Balls

6. The data submitted corresponding to 830 Series Subgroup B (Physical-Chemical properties) satisfy the data requirements of 40CFR§158.190 [MRID No. 462853-02].

CONCLUSIONS:

The TRB has reviewed the product chemistry data submitted for the proposed end use product and has concluded that:

- 1. The product chemistry data submitted corresponding to 830 Series Subgroup A and 830 Series Subgroup B (Physical/Chemical properties) are acceptable.
- 2. The CSF for basic formulation (dated 05-10-04) is acceptable.
- 3. The proposed product (File Symbol No. 81433-E) was determined to be substantially similar to the registered product with Req. No. 1475-39 from product chemistry point of view.
- 4. Product label: The registrant must make the following corrections on the proposed product label:
- (i). Under Ingredient statement the registrant must add the percentage of active ingredient (99.8%) and other ingredients as 0.2%. Total 100%.
- (ii). Since the Flash point of the product was determined to be 149.9°F, the registrant is recommended to add on the product label the following statement under Physical-Chemical Hazard in compliance with 40CFR§156.78: "Combustible. Do not use or store near heat or open flame".
- 5. The registration of the proposed product is subject to the approval and registration of the technical IMS p-Dichlorobenzene (File Symbol No. 81433-R), which is being used as the source of the active ingredient in the proposed end use product.

DP BARCODE No.: <u>D304941</u> File Symbol No.: <u>81433-E PRODUCT NAME: IMS Moth Balls</u>

PRODUCT CHEMISTRY DATA (SERIES 830 Subgroup A & Subgroup B)

Subgroup A	Data Required Fulfilled	MRID No.
830.1550. Chemical Identity (Basic CSF)	A	05-10-04
830.1600. Beginning Materials	А	462853-02 464606-01
830.1650. Formulation Process	Α	462853-02
830.1670. Discussion of Impurities	A	462853-02
830.1700. Preliminary Analysis	NA	
830.1750. Certified Limits (Basic CSF)	A	462853-02
830.1800. Enforcement Analytical Method	A	462853-01

Subgroup B	<u>Data Required</u> <u>Fulfilled</u>	<u>Value or</u> <u>Qualitat.</u> <u>Descrip.</u>	MRID No.
830.6302. Color	А	white	462853-02
830.6303. Physical State	Α	crystalline solid	u » u
830.6304. Odor	Α	moth ball like	и 39 ц
830.6314. Oxidation/Reduction Action	А	None	
830.6315. Flammability	А	149.9ºF	и 17 и
830.6316. Explodability	Α	Non-explosive	u n u
830.6317. Storage stability	Α	stable	и » и
830.6319. Miscibility	NA		
830.6320. Corrosion Characteristics	A	non-corrosive	462853-02
830.6321. Dielec. Bkd. Vltg.	NA		
830.7000. pH	NA	non-dispersible in water	462853-02
830.7100. Viscosity	NA		
830.7000. Density/Bulk Density	A	1.458 20°C	a 11 u

 $\underline{\text{Explanations}}\text{: A = The Requirements Were Fulfilled; N = The Requirements Were Not Fulfilled; NA = Not Applicable; G = Data Gap; U = Requires Upgrading; I = Incomplete or In Progress; W = Waived.}$

DP BARCODE No.: D304941 File Symbol No.: 81433-E PRODUCT NAME: IMS Moth Balls

830.1800. Enforcement analytical method: (MRID No. 462853-01)

The GC/FID with internal standard method was used to assay the active ingredient p-dichlorobenzene TGAI/MUP.

Instrument & Parameters:

Instrument: GC equipped with FID

Detector: FID

Detector temperature: 225°C Inlet temperature: 225°C

Carrier gas: Nitrogen with flow rate of 8.0 ml/min

Hydrogen: with flow rate of 40 ml/min Air: with flow rate of 300 ml/min

Column: HP-5, 15 m x 0.53 mm id, meting capillary column.

Injection mode: Split ratio 20:1 Column temperature: 60°C Volume injected: 1 µL

Internal standard: methyl toluate

Retention time: approximately 4.0 min for p-dichlorobenzene; 6.8 min for Internal standard

The analytical method was validated for precision, accuracy, and linearity.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

TECHNICAL REVIEW BRANCH SIMILARITY CLINIC DETERMINATION

July 20, 2004

MEMORANDUM

Subject:

Name of Pesticide Product:

EPA File Symbol:

DP Barcode: Decision No:

PC Code:

IMS Moth Balls

81433-E

D304944 345117

061501

Benzene

From:

Breann Hanson, Toxicologist Technical Review Branch

Registration Division (7505C)

To:

Kable Davis, RM Team 01

Insecticide-Rodenticide Branch Registration Division (7505C)

Applicant:

IMS Trading LLC.

4225 Longridge Ave., #207 Studio City, CA 91604

FORMULATION FROM LABEL:

Active Ingredient:

% by wt.

061501

Benzene

CAS No. 106-46-7

99.8%

Inert Ingredients:

Total:

0.2% 100.00%

ACTION REQUESTED: The Risk Manager requests:

"Attention Substantial Similarity Clinic, Please compare the following two products to see if substantially similar status applies. 81433-E and 1475-39..."

BACKGROUND: IMS Trading, LLC. has applied for registration of IMS Moth Balls, EPA File Symbol 81433-E, claiming similarity to ENOZ Para Moth Balls, EPA Reg. No. 1475-39. The submission includes a label and CSF for the cited product and the proposed product.

RECOMMENDATIONS: We have evaluated the formulations of the proposed product, 81433-E, and the cited product, 1475-39, and have found them to be substantially similar. The signal word is WARNING. TRB recommends that the proposed product, EPA File Symbol 81433-E, use the same precautionary labeling as the cited product, EPA Reg. No.1475-39.

This memorandum pertains only to the decision concerning whether the subject product is substantially similar to the cited product form an acute toxicological view point. For the purposes of this action, TRB has made no determinations of the adequacy of the toxicological data base or the precautionary label of the cited product.

	reverse before comple	sting form.		Form Ap	proved	1, OMB No. 20	070-0080), Approval expires 2-28-9
≎EPA	Environmenta	Inited States			✓	Registrat Amendm Other	ion	OPP Identifier Number
		Application	n for Pestic	ide - Sec	tion	I		
Company/Product Number IMS Trading, LLC Company/Product (Name) IMS Moth Balls	81433-E	•	PM#	Product Man	nager		ر ا	posed Classification None Restricted
5. Name and Address of Apr IMS Trading, LLC 4225 Longridge Ave a Studio City, CA 9160	# 207	ode)	6. Exp (b)(i), i to: EPA	pedited Revenue of the product Reg. No	is sim	nilar or identio	cal in cor	FIFRA Section 3(c)(3) mposition and labeling
			Section -					
Amendment - Explain Resubmission in resp Notification - Explain Explanation: Use addition This application qualifies as a (69 FR 12772).	onse to Agency letter below. nel pege(s) if necesser	y. (For section		Agency lett "Me Too" Other - Exp	ter dat Applica blain be	ation.		s March 17, 2004, Notice
· · · · · · · · · · · · · · · · · · ·			Section -	12.0				
1. Material This Product Will	Re Packaged In:		Section - I	18.8				
Child-Resistant Packaging Yes No Certification must be bmitted	Unit Packaging Yes No If "Yes" Unit Packaging wgt.	No. per container	Water Soluble F Yes No If "Yes" Package wgt	No. per containe	r	2. Type of C	ontainer Metal Plastic Glass Paper Other (S	necify) Cardboard Box
3. Location of Net Contents I	nformation ontainer	4. Size(s) Retai	Container oz. and 10 oz.		5. Lo	cation of Labe		กร
6. Manner in Which Label is	Affixed to Product	Lithogra Paper gl Stencile	Section - I	Othe	r			
1. Contact Point <i>(Complete</i>	items directly below f	or identification			if nece	essery, to pro-	ess this	application.
Name Isaac Shapiro		T	itie Dwner/President	***************************************		Т	elephone 318-789-5	No. (Include Area Code)
I certify that the stater I acknowledge that any both under applicable I	knowlinglly false or	misleading state	i contract of the contract of		•	•	or coch	ီReceivad မွ ီီ (Stamped)

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete.

4. Typed Name

Isaac Shapiro

White - EPA File Copy (original)
Report No. 983.001-03

Yellow - Applicant Copy

5. Date

Owner/President

5/10/04

Sheryl Lindros Dolan

Direct Dial: 202/266-5031 Email: sldolan@actagroup.com



May 28, 2004

Via Hand Delivery

Document Processing Desk Office of Pesticide Programs U.S. Environmental Protection Agency Room 266A, Crystal Mall 2 1921 Jefferson Davis Highway Arlington, VA 22202-4501

Re: FIFRA Me-Too Registration Applications for a Manufacture-Use Product and Four End-Use Products, Submitted by IMS Trading, L.L.C.

Dear Document Processing Officer:

On behalf of IMS Trading, L.L.C., we are submitting the accompanying me-too registration applications for a manufacture-use product and four associated end-use products.

The registrant is IMS Trading, L.L.C. (IMS), headquartered in Studio City, CA. IMS is a small business. The products that are the subject of the accompanying registration applications will be IMS' first pesticide products. IMS, therefore, is requesting a waiver of the registration service fees; waiver requests for the registration applications accompany this letter.

The following documents accompany this letter:

- Transmittal document;
- Fee waiver letter-requests: one each for the manufacturing-use product and the four end-use products, five total; and
- Seven volumes with the registration applications (3 copies of each).

Document Processing Officer May 28, 2004 Page 2



If you have any questions about this submission, please contact me at 202-266-5031, or IMS' President, Isaac Shapiro, at 818-789-5157.

Sincerely yours,

Sheryl Lindros Dolan

Enclosures

Transmittal Document

Name and Address of Submitter:

IMS Trading, L.L.C. 4225 Longridge Avenue, #207 Studio City, CA 91604

Company No.:

not yet assigned

Contact Person:

Isaac Shapiro

Telephone:

(818) 789-5157

Email:

isaac.shapiro@imstrading.net

Regulatory Actions:

Application for Section 3 FIFRA Registration of IMS Paradichlorobenzene Application for Section 3 FIFRA Registration of IMS Moth Balls Application for Section 3 FIFRA Registration of IMS Moth Block Application for Section 3 FIFRA Registration of IMS Moth Cake Application for Section 3 FIFRA Registration of IMS Moth Crystals

Transmittal Date:

May 28, 2004

List of Submitted Studies: Please see the accompanying list.

List of Submitted Studies -- IMS Trading, L.L.C.

Volume No.	Contents	Guideline No.	Report Title	MRID No.
1	Administrative	N/A	Application for Registration of Paradichlorobenzene, Report No. 983.001-01.	ADMIN
2	Product Identity and Composition Description of Materials Used to Produce the Product Description of Production Process Discussion of Formation of Impurities Preliminary Analysis Certified Limits Enforcement Analytical Method Physical/Chemical Properties	830.1550 830.1600 830.1620 830.1670 830.1700 830.1750 830.1800 830.6302 830.6303 830.6304 830.6317 830.6320 830.7200 830.7220	Groups A & B Product Chemistry: Paradichlorobenzene, Report No. 983.001-02.	46285301
		830.7300 830.7840 830.7950		
3	Administrative	N/A	Application for Registration of LMS Meth Balls, Report No. 983.001-03.	ADMIN
4	Administrative	N/A	Application for Registration of IMS Moth Block, Report No. 983.001-04.	ADMIN ADMIN ADMIN
5	Administrative	N/A	Application for Registration of IM3 Moth Cake, Report No. 983.001-05.	ADMIN

Volume No.	Contents	Guideline No.	Report Title	MRID No.
6	Administrative	N/A	Application for Registration of IMS Moth Crystals, Report No. 983.001-06.	ADMIN
7	Product Identity and Composition Description of Materials Used to Produce the Product	830.1550 830.1600 830.1650	Groups A & B Product Chemistry: Moth Balls, Moth Block, Moth Cake, Moth Crystals, Report No. 983.001-07.	46285302
	Description of Formulation Process Discussion of Formation of Impurities	830.1670 830.1750		
	Certified Limits Physical/Chemical Properties	830.6302 830.6303 830.6304 830.6317 830.6320 830.7200		
		830.7220 830.7300 830.7840 830.7950		

	everse before comple	ating form.		Form An	proved	d. OMB No. 2	070-0060	D. Approval expires 2-28-9
⊕ EPA	Environmenta	United States	-	de	1	Registra Amenda Other	tion	OPP Identifier Number
		Applicatio	n for Pestic	de - Sec	tion	1		
1. Company/Product Number IMS Trading, LLC	81433-E		2. EPA	Product Mai	nager		F ***	posed Classification
4. Company/Product (Name) IMS Moth Balls			PM#	7				110001000
5. Name and Address of Appl IMS Trading, LLC 4225 Longridge Ave # Studio City, CA 91604	‡207	ode)	(b)(i), r to: EPA	ny product Reg. No.	is sim	nilar or identi	cal in co	FIFRA Section 3(c)(3) mposition and labeling
			Section -	11				
Amendment - Explain Resubmission in resp Notification - Explain Explanation: Use addition This application qualifies as a (69 FR 12772).	onse to Agency letter below. al page(s) if necessar	ry. (For section		Agency let "Me Too" Other - Exp	ter dat Applica	ation.		s March 17, 2004, Notice
			Section - I	11				
1. Material This Product Will	Be Packaged In:							
Child-Resistant Packaging Yes No * Certification must be submitted	Unit Packaging Yes √ No If "Yes" Unit Packaging wgt	No. per . container	Water Soluble F Yes ✓ No If "Yes" Package wgt	No. per containe	or	2. Type of	Metal Plastic Glass Paper Other (S	pecify) Cardboard Box
3. Location of Net Contents V Label C	nformation ontainer	4. Size(s) Reta	ail Container 7 oz. and 10 oz.		5. Lo	Back Sid		ns
6. Manner in Which Label is	Affixed to Product	Lithogr Paper of Stencil	aph glued	Othe	or			
			Section - I	V				
1. Contact Point (Complete	items directly below	for identification	of individual to b	e contacted,	if nec	essary, to pro	cess this	application.
Name Isaac Shapiro			Title Owner/Presiden				Telephone 818-789-5	No. (Include Area Code)
I certify that the stater I acknowledge that and both under applicable I	knowlingly false or		all attachments th					6. Date Application Received (Stamped)
Signature		3	Owner/President				Č.	
4. Typed Name Isaac Shapiro		5	5. Date					****

ORIGINAL SIGNATURES

VOLUME 3 OF SUBMISSION

STUDY TITLE

Application for Registration of IMS Moth Balls

DATA REQUIREMENT

Administrative Volume

AUTHOR

Sheryl Lindros Dolan

COMPLETION DATE

May 25, 2004

REPORT NUMBER

983.001-03

PREPARED BY

The Acta Group, L.L.C. 1203 Nineteenth Street, NW Suite 300 Washington, D.C. 20036-2401

SUBMITTER

IMS Trading, L.L.C. 4225 Longridge Avenue, #207 Studio City, CA 91604



STATEMENT OF $\underline{\mathbf{NO}}$ DATA CONFIDENTIALITY CLAIMS

No claim of confidentiality is made for any information contained in this study on the basis of its falling within the scope of FIFRA section 10 (d) (1) (A), (B), or (C).

Company:

IMS Trading, L.L.C.

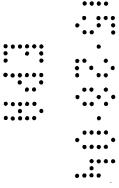
Company Agent:

Isaac Shapiro

President

Signature

Date: 5/10/04



GOOD LABORATORY PRACTICE COMPLIANCE STATEMENT

This volume does not meet the GLP requirements specified in 40 CFR Part 160. No study director was assigned.

Sponsor/Submitter:

IMS Trading, L.L.C.

Company Agent:

Isaac Shapiro President

Signature:

Date: 5/10/04

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Sheryl Lindros Dolan

Direct Dial: 202/266-5031 Email: sldolan@actagroup.com



May 28, 2004

Via Hand Delivery

Document Processing Desk Office of Pesticide Programs U.S. Environmental Protection Agency Room 266A, Crystal Mall 2 1921 Jefferson Davis Highway Arlington, VA 22202-4501

Re: FIFRA Me-Too Registration Applications for a Manufacture-Use Product and Four End-Use Products, Submitted by IMS Trading, L.L.C.

Dear Document Processing Officer:

On behalf of IMS Trading, L.L.C., we are submitting the accompanying me-too registration applications for a manufacture-use product and four associated end-use products.

The registrant is IMS Trading, L.L.C. (IMS), headquartered in Studio City, CA. IMS is a small business. The products that are the subject of the accompanying registration applications will be IMS' first pesticide products. IMS, therefore, is requesting a waiver of the registration service fees; waiver requests for the registration applications accompany this letter.

The following documents accompany this letter:

- Transmittal document;
- Fee waiver letter-requests: one each for the manufacturing-use product and the four end-use products, five total; and
- Seven volumes with the registration applications (3 copies of each).

Page 5 of 32

Document Processing Officer May 28, 2004 Page 2



If you have any questions about this submission, please contact me at 202-266-5031, or IMS' President, Isaac Shapiro, at 818-789-5157.

Sincerely yours,

Sheryl Lindros Dolan

Enclosures



4225 Longridge Ave, Suite #207 Studio City, Ca. 91604 Phone (818) 789-5157 Fax (818) 789-5191

By Hand Delivery

Document Processing Desk (FEEWAIVER)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202-4501

RE: Fee Waiver for Accompanying Me-Too Registration Application for End-

Use Product IMS Moth Balls by IMS Trading, L.L.C.

Dear Document Processing Officer:

IMS Trading, L.L.C. (IMS) respectfully requests a 100-percent fee waiver for the above-referenced registration application, which is being delivered together with this waiver request. Substantiation of IMS's eligibility for a 100-percent fee waiver is provided below and in the accompanying attachments. Also accompanying this fee waiver request are four identical fee waiver requests, one for an active ingredient (AI) / manufacturing use product (MP), and three for three other end-use product registration applications. Each end-use product is formulated with the AI/MP that is the subject of the accompanying registration application.

Section 1: Business Identification

Company Name:

IMS Trading, L.L.C.

Company EPA Number: Mailing Address:

Not yet assigned (These are the company's first registrations.)

Mailing Address: 4225 Longridge Avenue, #207, Studio City, CA 91604

Contact Person: Isaac Shapiro (President)

Contact Information: 818-789-5157; isaac.shapiro@imstrading.net

are projecti

Section 2: Eligibility for Small Business 100-Percent Fee Waiver

IMS meets the criteria for a full (100 percent) waiver from registration fees. I attach the following documents from IMS' accountant to demonstrate IMS's eligibility:

- Form 568, 2002 California LLC Return of Income; and
- Form 3522, Limited Liability Company Tax Voucher.

First, IMS has only one investor, me, who founded the company in 2002. The above-referenced forms substantiate that IMS is a single member limited liability corporation without additional employees. The waiver requirement that the company has less than 500 employees is thus met.

Second, the products that are the subject of the accompanying registration applications will be IMS's first products. The accompanying Form 568 demonstrates total income in 2002 of the filing date will be in October) but total income will be comparable. The waiver requirement that the company earn less than \$10 million annually is thus met.

Finally, IMS has no business affiliates. I am the sole owner. IMS has no subsidiaries.

Section 3: Certification Statement

I, Isaac Shapiro, the President of IMS Trading, L.L.C., am authorized and have personal knowledge sufficient to make this certification on behalf of IMS. I hereby certify under the penalty of perjury that the documentation submitted in connection with IMS's fee waiver request is true, complete, and correct in all material respects.

Sincerely

Isaac Shapiro President

Attachments

KIMBERLY C. COVEY, CPA 301 N. LAKE AVE., SUITE 800 PASADENA, CA 91101 (626) 584-6157

October 6, 2003

IMS TRADING, LLC 4225 LONGRIDGE AVE., #207 STUDIO CITY, CA 91604

Dear Client:

Enclosed for your review and filing are the following:

Form 568

2002 California LLC Return of Income

Form 3522

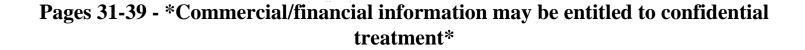
Limited Liability Company Tax Voucher PAID

Each tax return or form listed above should be filed in accordance with the enclosed filing instructions.

Please call if you have any questions.

Sincerely,

Kim Covy KIMBERLY C. COVEY



II. Summary of the Registration Application

IMS Trading, L.L.C. (IMS) is submitting a follow-on, me-too registration for IMS Moth Balls. This registration application accompanies three other me-too registration applications for end-use products, as well as a follow-on registration application for the manufacturing-use product paradichlorobenzene.

IMS will have its Moth Ball product produced by

A confidential statement of

formula (CSF) is included in Section V of this volume. The CSF demonstrates that IMS' product is the same or substantially similar as the existing registration by Willert Home Products Inc., EPA Registration No. 1475-39.





PRECAUTIONARY STATEMENTS: HAZARD TO HUMANS AND DOMESTIC ANIMALS. WARNING: Causes eye, skin, and respiratory tract irratation. Harmful if Swallowed. Avoid contact with skin, eyes, or clothing. STATEMENT OF PRACTICAL TREATMENT: IF SWALLOWED: Drink promptly a large quantity of water. Do not induce vomiting. Avoid alcohol.

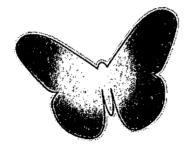
pedical attention. (ES: Immediately flush w/ of water for at least 15 minutes. Get medical attention. IF ON SKIN: Immediately flush w/ plenty of water. Remove contaminated clothing. Wash clothing before reuse. IF INHALED: Remove to fresh air. reathing, give artificial ion. If breathing is difficult, give oxygen. Get medical attention STORAGE AND DISPOSAL: Do not rouse empty box or cellophane. Wrap container and put in trash. NOTICE: California has determined that a chemical

> EPA Reg. No. EPA Est.

contained in this product casues cancer based on tests performed on laboratory animals.



KILLS MOTHS & CARPET BEETLES







ADDITIONAL PRECAUTIONS
ACTIVE INGREDIENT: PARADICHLOROBENZENE
INERT INGREDIENTS:
TOTAL:

NET WT. 7 OZ. (198.45g)



DIRECTION FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Thoroughly brush or clean articles to be stored. Use at rate of 1 bag (7 oz.) for each 40 cubic ft. of tightly enclosed space. Distribute IMS Moth Balls evenly around and between the folds of stored articles. Be sure storage space is kept tightly closed at all times and for at least 7 days after protecting with IMS Moth Balls.

IMS Moth Balls will not harm the finest woolens, furs, silk, or other fabrics. Pleasant odor quickly vanishes when articles are aired.

Paradichlorobenzene Moth Balls should not be mixed or placed in contact with Naphthalone Moth Balls or Flakes.

Do not use in plastic storage box or place in contact with plastic items as paradichlorobenzene damages some plastics.

DISTRIBUTED BY:







PRECAUTIONARY STATEMENTS: HAZARD TO HUMANS AND DOMESTIC ANIMALS. WARNING: Causes eye, skin, and respiratory tract irratation. Harmful if Swallowed. Avoid contact with skin, eyes, or clothing. STATEMENT OF PRACTICAL TREATMENT: IF SWALLOWED: Drink promptly a large quantity of water. Do not induce vemiting. Avoid alcohol. Calegodical attention.

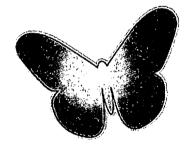
YES: Immediately flush w/ of water for at least 15 rutes. Get medical attention. IF ON SKIN: Immediately flush w/ plenty of water. Remove contaminated clothing. Wash clothing before reuse. IF INHALED: Remove to fresh air. reathing, give artificial ion. If breathing is difficult, give oxygen. Get medical attention STORAGE AND DISPOSAL: Do not rouse empty box or cellophane. Wrap container and put in trash. NOTICE: California has

NOTICE: California has dotermined that a chemical contained in this product casues cancer based on tests performed on laboratory animals.

> EPA Reg. No. EPA Est.



KILLS MOTHS & CARPET BEETLES





KEEP OUT OF REACH OF CHILDREN. WARNING: SEE SIDE PANEL FOR ADDT'L INSTRUCTIONS.



ADDITIONAL PRECAUTIONS ACTIVE INGREDIENT: PARADICHLOROBENZENE

ACTIVE INGREDIENT: PARADICHLOROBENZENE INERT INGREDIENTS:
TOTAL:

NET WT. 7 OZ. (198,45g)



DIRECTION FOR USE:
It is a violation of Federal Law
to use this product in a manner
inconsistent with its labeling.

Thoroughly brush or clean articles to be stored. Use at rate of 1 bag (7 oz.) for each 40 cubic ft. of tightly enclosed space. Distribute IMS Moth Balls evenly around and between the folds of stored articles. Be sure storage space is kept tightly closed at all times and for at least 7 days after protecting with IMS Moth Balls.

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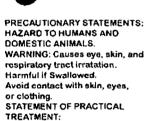
Paradichlorobenzene Moth Balls should not be mixed or placed in contact with Naphthalone Moth Balls or Flakes.

Do not use in plastic storage box or place in contact with plastic items as paradichlorobenzone damages some plastics.

DISTRIBUTED BY:







IF SWALLOWED: Drink promptly a large quantity of water. Do not induce vomiting. Avoid alcohol.

resistance of water for at least 15 minutes. Get medical attention. IF ON SKIN: Immediately flush w/ plenty of water. Remove contaminated clothing. Wash clothing before reuse.

IF IMHALED: Remove to fresh air. If reathing, give artificial reaching is

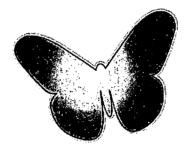
difficult, give oxygen.
Get medical attention.
STORAGE AND DISPOSAL:
Do not rouse empty box or
cellophane. Wrap container and
put in trash.

NOTICE: California has determined that a chemical contained in this product casues cancer based on tests performed on laboratory animals.

> EPA Reg. No. EPA Est.



KILLS MOTHS & CARPET BEETLES



KEEP OUT OF REACH OF CHILDREN.
WARNING: SEE SIDE PANEL
FOR ADDT'L INSTRUCTIONS.



ADDITIONAL PRECAUTIONS

ACTIVE INGREDIENT: PARADICHLOROBENZENE INERT INGREDIENTS:
TOTAL:

NET WT. 7 OZ. (198.45g)



DIRECTION FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Thoroughly brush or clean articles to be stored. Use at rate of 1 bag (7 oz.) for each 40 cubic ft, of tightly enclosed space. Distribute IMS Moth Balls evenly around and between the folds of stored articles. Be sure storage space is kept tightly closed at all times and for at least 7 days after protecting with IMS Moth Balls.

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Do not use in plastic storage box or place in contact with plastic items as paradichlorobenzene damages some plastics.

DISTRIBUTED BY:





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for registration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460.

Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.									
Certification with Respect to Citation of Data									
Applicant's/Registrant's Name, Address, and Telephone Number IMS Trading, LLC, 4225 Longridge Ave #207 Studio City, CA 91604, 818-789-5157 EPA Registration Number/File Symbol 81+33-2									
Active Ingredient(s) and/or representative test compound(s) Paradichlorobenzene		Date							
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158 Irrdoor	3)	Product Name IMS Moth Balls							
NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).									
I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).									
SECTION I: METHOD OF DATA SUP	PORT (Check one m	nethod only)							
I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	a list of companies sent offers of compensation (the Data Matrix form under the selective method), and have included with this form a								
SECTION II: GENERAL	OFFER TO PAY								
[Required if using the cite-all method or when using the cite-all option under the selection of the selectio	the approval of this	The state of the s							
SECTION III: CERT	W- Market State of the State of								
I certify that this application for registration, this form for reregistration, or the application for registration, the form for reregistration, or the Data-Call-In response. In indicated in Section I, this application is supported by all data in the Agency's files the substantially similar product, or one or more of the ingredients in this product; and (2) requirements in effect on the date of approval of this application if the application sources. I certify that for each exclusive use study cited in support of this registration.	n addition, if the cite- at (1) concern the pro- is a type of data tha ght the initial registra	all option or cite-all option under the selective method is operties or effects of this product or an identical or t would be required to be submitted under the data ation of a product of identical or similar composition and							
the written permission of the original data submitter to cite that study.	i or reregion autin, ur	at this original data submitted of that they obtained							
I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.									
I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.									
I certify that the statements I have made on this form and all attachm knowingly false or misleading statement may be punishable by fine or impriso									
Signature / D/	Date	Typed or Printed Name and Title • • •							
Isan fly	5/10/04	Isaac Shapiro, Owner/President							

EPA Form 8570-34 (9-97) Electronic and Paper versions available. Submit only Paper version.



Form Approved OMB No. 2070-0060

Agency Internal Use Copy



Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

	DATA MATRIX							
	Date			EPA Reg No./File Symbol	EPA Reg No./File Symbol			
	Applicant's/Registrant's Name & Address Isaac Shapiro, IMS Trading, LLC, 4225 Longridge Ave #207, Studio City, CA 91604		Product IMS Moth Balls					
	Ingredient Paradichlorobenzene							
	Guideline Reference Number	Guideline Study Name	MRID Numbe	Submitter	Status	Note		
	CITE-ALL			Willert Home Products Inc. (Company No. 1475) OLD			
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5	Signature	7~		Name and Title Isaac Shapiro, Owner/President		Date 5 /10/04		

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Transmittal Document

Name and Address of Submitter:

IMS Trading, L.L.C. 4225 Longridge Avenue, #207 Studio City, CA 91604

Company No.:

not yet assigned

Contact Person:

Isaac Shapiro

Telephone:

(818) 789-5157

Email:

isaac.shapiro@imstrading.net

Regulatory Actions:

Application for Section 3 FIFRA Registration of IMS Paradichlorobenzene

Application for Section 3 FIFRA Registration of IMS Moth Balls

Application for Section 3 FIFRA Registration of IMS Moth Block

Application for Section 3 FIFRA Registration of IMS Moth Cake

Application for Section 3 FIFRA Registration of IMS Moth Crystals

Transmittal Date:

May 28, 2004

List of Submitted Studies: Please see the accompanying list.

List of Submitted Studies -- IMS Trading, L.L.C.

Volume No.	Contents	Guideline No.	Report Title	MRID No.
1	Administrative	N/A	Application for Registration of Paradichlorobenzene, Report No. 983.001-01.	
	Product Identity and Composition	830.1550		
2	Description of Materials Used to	830.1600	Groups A & B Product Chemistry: Paradichlorobenzene, Report No.	
[].		830.1620	983.001-02.	
}	Description of Production Process	830.1670		
	Discussion of Formation of Impurities	830.1700		
	Preliminary Analysis	830.1750		
	Certified Limits	830.1800		·
	Enforcement Analytical Method	830.6302		
	Physical/Chemical Properties	830.6303		
		830.6304		
		830.6317		
		830.6320		
}		830.7200 830.7220		
		830.7220		
		830.7840		
		830.7950		
			Application for Registration of IMS Moth	
3	Administrative	N/A	Balls, Report No. 983.001-03.	
			Application for Registration of IMS Moth	
4	Administrative	N/A	Block, Report No. 983.001-04.	
55	Administrative	N/A	Application for Registration of IMS Moth Cake, Report No. 983.001-05.	

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Volume	Contents	Guideline	Report Title	MRID No.
No.		No.		
6	Administrative	N/A	Application for Registration of IMS Moth Crystals, Report No. 983.001-06.	
7	Product Identity and Composition Description of Materials Used to Produce the Product Description of Formulation Process Discussion of Formation of Impurities Certified Limits Physical/Chemical Properties	830.1550 830.1600 830.1650 830.1670 830.1750 830.6302 830.6303 830.6304 830.6317 830.6320 830.7200 830.7220 830.7300 830.7840 830.7950	Groups A & B Product Chemistry: Moth Balls, Moth Block, Moth Cake, Moth Crystals, Report No. 983.001-07.	

